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September 16, 2019

**Via Electronic Filing**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street SW  
Washington, DC 20554

**Re: Spectrum Access System (SAS) Initial Commercial Deployment (ICD) (GN Docket No. 15-319)**

Dear Ms. Dortch:

Google LLC (Google) submits the following response to the Public Notice released on September 16, 2019:<sup>1</sup>

1. The beginning date for the Google SAS ICD is September 16, 2019.
2. The geographic areas in which Citizens Broadband Radio Service Devices under Google SAS control will operate are<sup>2</sup>:

State	Locations
Alabama	City of Birmingham
Arizona	City of Tucson
Arkansas	Lonoke Township, City of Little Rock

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<sup>1</sup> Public Notice, *Wireless Telecomms. Bureau and Office of Engineering and Tech. Approve Five Spectrum Access System Adm'rs to Begin Initial Commercial Deployments in the 3.5 GHz Band*, GN Docket No. 15-319, DA 19-915, ¶ 6 (rel. Sept. 16, 2019).

<sup>2</sup> This is the most accurate and up-to-date list based on customer inputs, and may differ from the list filed on September 10, 2019. See Letter from Megan Anne Stull, Counsel, Google LLC, and Andrew W. Clegg, Spectrum Engineering Lead, Google LLC, to Marlene H. Dortch, Secretary, FCC, in GN Docket No. 15-319 (filed Sept. 10, 2019) (*September 10 Letter*).

California	City of Anaheim, City of Cupertino, City of Mountain View, City of Oakland, City of Inglewood, City of Santa Monica, City of Napa, City of Los Angeles, City of San Jose, City of Santa Rosa
Colorado	City of Denver, City of Castle Rock, La Plata County
Florida	City of Lakeland, City of Orlando, City of Miami, City of Tampa, City of Melbourne, City of Gainesville, City of Jacksonville, City of Williston
Georgia	City of Sea Island, City of Americus, City of Tifton
Illinois	City of Chicago, City of Mascoutah, City of Jerseyville, City of Marseilles, City of Mendota, City of Elsau
Indiana	City of Butler, City of Indianapolis, City of West Lafayette, City of Lafayette, City of Westfield
Iowa	City of Clarion, City of Des Moines, City of Cedar Rapids, City of Davenport, City of Hampton, City of Mason City
Kansas	City of Dodge City, Atchison County, Jefferson County, Leavenworth County, Jackson County
Kentucky	Florence County, Louisville County, Shelby County, Scott County
Maine	City of Standish, City of Portland, City of Bangor, City of Houlton
Michigan	City of Pigeon, City of Ionia, City of Marcellus, City of Caledonia, City of East Lansing, City of Grand Rapids, City of Kentwood, City of Lansing, City of Southfield
Minnesota	City of Minneapolis, City of St. Cloud
Mississippi	City of Jackson
Missouri	City of Kansas City, City of St. Louis, City of Clinton, City of Tightwad
Nebraska	City of Lincoln, City of Mitchell, City of Imperial
Nevada	City of Las Vegas
New Mexico	Black Mesa

New York	Danville County, Rensselaer County, Albany County, Washington County, Saratoga County, Schenectady County, Warren County
North Carolina	City of Cedar Grove, City of Seven Springs, City of Alphin, City of Cashiers, City of Greenville
North Dakota	City of Grand Forks, City of Fargo
Ohio	City of Ashland, City of Avon Lake, City of Canal Winchester, City of Celina, City of Cincinnati, City of Cleveland, City of Columbus, City of Cuyahoga Falls, City of Dayton, City of Defiance, City of Dennison, City of Dublin, City of Edgerton, City of Euclid, City of Highland Heights, City of Hudson, City of Kettering, City of Lewis Center, City of Lima, City of Lyndhurst, City of Lyons, City of Mayfield Heights, City of Medina, City of Miamisburg, City of North Ridgeville, City of Painesville, City of Payne, City of Richmond Heights, City of Sandusky, City of South Bass Island, City of Springfield, City of Strongsville, City of University Heights, City of Westerville, City of Willoughby, Liberty Township, Butler County, Hamilton County, Ashland County, Wayne County, Montgomery County, Franklin County
Oregon	City of Roseburg, City of Grants Pass, City of Medford
Pennsylvania	City of Philadelphia, Blair County, Westmoreland County, Warren County
Texas	City of Humble, City of Amarillo, City of Dumas, Blanco County, Dallas County, Gillespie County
Utah	City of Cedar City, City of Parowan, City of St. George, City of Roosevelt
Virginia	City of Charlottesville, Amelia County, Frederick County, Loudoun County, Montgomery County, Pulaski County; Multiple locations in Southwest Virginia
Washington	City of Seattle
Wisconsin	City of Milwaukee, City of Madison, City of Racine
Wyoming	City of Laramie, City of Lusk

3. The Google SAS is Dynamic Protection Area-enabled.
4. Google SAS will operate with the Commission-approved Google/CommScope Environmental Sensing Capability system.<sup>3</sup>
5. The expected end date of the Google SAS ICD reporting period is October 16, 2019.

The contact information for Google's SAS to be used by incumbent operators during the ICD period is [sas-operations@google.com](mailto:sas-operations@google.com).

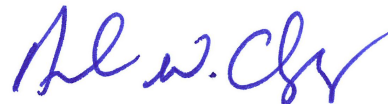
We will inform the Commission prior to the effective date of any changes to the above information. Otherwise, all operations will be in accordance with Google's August 23, 2019 ICD filing,<sup>4</sup> as amended on September 10, 2019.<sup>5</sup>

Please contact the undersigned with any questions.

Respectfully submitted,



Megan Anne Stull  
Counsel



Andrew W. Clegg  
Spectrum Engineering Lead  
Google LLC

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<sup>3</sup> See *Wireless Telecomms. Bureau and Office of Engineering and Tech. Announce the Approval of Environmental Sensing Capabilities for the 3.5 GHz Band*, Public Notice, 34 FCC Rcd. 2792 (rel. Apr. 29, 2019). Google is approved to operate an ESC both in its individual capacity and in partnership with CommScope. *Id.* at n.12 (explaining that Google and CommScope entered into a joint partnership to operate an ESC).

<sup>4</sup> See Letter from Megan Anne Stull, Counsel, Google LLC, and Andrew W. Clegg, Spectrum Engineering Lead, Google LLC, to Marlene H. Dortch, Secretary, FCC, in GN Docket No. 15-319 (filed Aug. 23, 2019).

<sup>5</sup> See *September 10 Letter*.